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November 16, 1993

93-RF-296E

Richard J. Schassburger Acting Director Environmental Restoration Division DOE, RFO

SCHEDULE EXTENSION ASSUMPTIONS RESULTING FROM THE BASELINE RISK ASSESSMENT WORK STOPPAGE - WSB-457-93

The current work stoppage for Operable Units 2 through 7, on baseline risk assessment issues, will require schedule extension negotiations following resolution of the work stoppage. To avoid misunderstanding, the issues effecting the Operable Unit (OU) schedule extension requests should be identified to the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH).

The EPA and CDH letter dated August 12, 1993, agreeing to the work stoppage stated: "...once these issues are resolved, DOE shall evaluate and submit to EPA and CDH the impact to the above listed operable unit schedules associated with the diligent resolution of these issues in order to extend affected schedules pursuant to Part 42 of the IAG." Past schedule extension requests have been contentious, in part due to the lack of a common understanding of the impacted project tasks and required activities. To avoid additional controversy, the following schedule extension issues should be made clear to the agencies, prior to negotiations:

- 1) The new schedule will place the risk assessment tasks on the critical path for completion of the RCRA [Resource Conservation and Recovery Act] Facilities Investigation/Remedial Investigation (RFI/RI) Report, thus a day-for-day extension from the original stop work date is a minimal requirement.
- 2) Any scope increases to the OU Work Plans will require additional time to plan, implement and perform the additional work. The additional time required depends upon the extent of additional work.
- 3) Scope increases beyond the OU Work Plans will require additional time to identify funding and obtain budget approval for the additional work.

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- 4) Scope increases beyond the OU Work Plans will require additional time to procure the appropriate resources. The OU subcontracts are generally based on the approved Work Plans, thus changes to the respective work plan scope will require procurement of subcontract modifications. The time required for this activity also depends upon the extent of the work required.
- 5) Scope increases beyond the OU Work Plans will also require additional time to revise the controlled Work Plans which will require review and approval from Interagency Agreement (IAG) signatories.
- 6) If resolution of the data aggregation issue results in a significant change to the existing relationship between the risk assessment and the nature and extent of contamination task, significant schedule adjustment will be required.

Please call me, or Michael Guillaume of my staff at 966-8557, if you should have further questions.

hope ws Bussy

W. S. Busby

Acting Director

ERM/Remediation Project Management

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Orig. and 1 cc - R. J. Schassburger